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August 11, 2015

Michele Esch, Designated Federal Officer and Executive Director  
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Sent via email to [nareee@ars.usda.gov](mailto:nareee@ars.usda.gov)

Ms. Esch:

On behalf of The Humane Society of the United States and our members and supporters, thank you for the opportunity to submit public comment in response to the July 23 report, "Final Report: Findings and recommendations on the phase two review of animal care and well-being at the agricultural research service to the REE Under Secretary."

There has been continued public outcry and congressional attention to the findings of the January 19 investigative piece by *The New York Times* on the U.S. Meat Animal Research Center (USMARC), located in Clay Center, Nebraska. The *NY Times* based the piece on information provided by various whistleblowers as well as extensive records obtained through Freedom of Information Act requests.

We support the agency's decision to investigate additional facilities outside of USMARC to provide further insight on animal research conducted by the Agricultural Research Service (ARS). We thank the panel for providing information in the final report about the methodology for selecting additional facilities and what documentation was reviewed during the site visits. We remain concerned that the inspections were pre-announced and that facilities were told what paperwork would be reviewed, giving these facilities ample opportunity to address problems in advance. In addition, by only reviewing active research projects, the panel may have overlooked signs of inadequately functioning Institutional Animal Care and Use Committees (IACUCs). We are hopeful that the findings at USMARC prompted agency wide changes and appreciate the actions taken by these facilities to correct any and all issues related to animal welfare, but without proper oversight of ARS research, we are concerned that animal welfare improvements will be temporary and not consistent across all facilities.

While the report shows these facilities each have a stronger IACUC than the one found at USMARC, it is apparent that ARS still has multiple improvements to make in regard to the review and oversight of animal research protocols, training and standards. Problems include:

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- A lack of clarification across IACUCs regarding how to respond to concerns about animal welfare
- Publically unavailable “whistleblower” policies
- Absence of an acceptable Attending Veterinarian
- Multiple deficiencies in properly constituted IACUCs
- Insufficient opportunities for continued training

**We express our support of the panel recommendations laid out in the July 23 report that pertain to these significant problems.** We are also pleased with the Animal Welfare Action Plan that ARS updated on June 17.

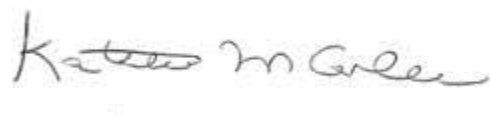
We encourage ARS to follow the requirements of the Animal Welfare Act (AWA) and to seek Animal and Plant Health Inspection Service (APHIS) inspections of all its facilities. The USDA, which enforces the AWA at research institutions throughout the US, should be a leader in animal welfare oversight at its own facilities regardless of the types of animals used or the purpose of the research. We were pleased to see in the USDA-ARS Animal Welfare Action Plan updated June 2015 that ARS is following AWA and Public Health Service requirements and that employees are receiving training in compliance with these standards.

We are also encouraged that ARS is registering its research facilities with APHIS and seeking inspections. APHIS should carry out rigorous, unannounced inspections of USDA facilities, and make the results public. We also urge USDA to require each facility to submit an annual report of animal research activities: transparency is vital for taxpayer funded facilities.

Additionally, USDA should formally utilize the Animal Welfare Information Center (AWIC) to provide ARS staff and IACUC members with training for improved animal care and use in research. This report and the March 9 report highlight the woefully inadequate IACUCs in use at ARS facilities. AWIC workshops and training would help educate and professionalize research in alternatives and expectations of IACUC members.

Thank you again for the opportunity to comment and we hope you will take further action, as requested.

Respectfully submitted,



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